

United States Senate

WASHINGTON, DC 20510

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July 9, 2019

The Honorable Ajit V. Pai
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

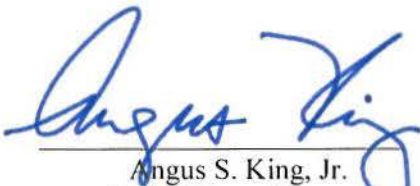
Dear Chairman Pai:

One of the Commission's core responsibilities is to promote the availability of affordable broadband access to all Americans. Spectrum policy plays a key role in achieving this goal. One spectrum success story has been the Educational Broadband Service (EBS), which has enabled educational entities to partner with commercial operators to create public-private partnerships that achieve the Commission's goals of intensive commercial use, promoting education, and serving rural communities. We commend the Commission for proposing to finish licensing EBS spectrum, particularly in areas with limited or no broadband options, and for seeking comment on "rationalizing" existing Geographic Service Areas (GSAs) by automatically expanding them to the nearest county boundary, a set of policies that we believe will improve rural broadband access. However, we were disappointed the proposed Report & Order did not include a rationalization mechanism.

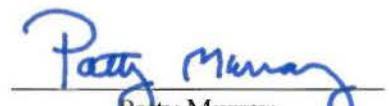
We strongly support an automatic rationalization process on a county basis for existing GSAs with a low coverage threshold. Particularly for GSAs licensed to state governments (including instrumentalities such as public university systems), this rationalization should take place in each county that the GSA overlaps or intersects, regardless of the percentage overlap. This will encourage the most efficient use of spectrum by combining the use of adjacent spectrum blocks on a statewide basis where such an opportunity exists—enabling the highest potential throughput for every end-user in the state. By automatically expanding existing GSAs to include slivers of unassigned spectrum, the FCC can immediately put this critical mid-band spectrum into the pipeline for wireless services and help expand access to rural broadband.

We also support maintaining EBS educational use requirements. A continued focus on educational uses can help foster solutions to the homework gap for rural students and the unique benefits that EBS provides. Few rulemakings provide the Commission with a near-term opportunity to close the digital divide and homework gap, expand rural broadband, and accelerate 5G deployment. We encourage the Commission to rationalize EBS GSAs to county boundaries based on *any* amount of existing GSA overlap. EBS has proven successful, and this approach will maximize the band's utility for quickly expanding rural broadband coverage.

Sincerely,


Angus S. King, Jr.
United States Senator


Susan M. Collins
United States Senator


Patty Murray
United States Senator

CC: The Honorable Michael O'Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner
The Honorable Geoffrey Starks, Commissioner